EMPIRE STATE HONEY PRODUCERS ASSOCIATION

A Statewide Organization to Promote and Protect Interests of New York State Beekeepers

EUGENE GASCON, President

10177 Co. Rd. 16 Swain, NY 14884

PETER BIZZOSO, 1st Vice Pres.

505 Wading River Road Manorville, NY 11949-3448

ROBERT KIME, 2nd Vice Pres.

919 Kennedy Road Romulus, NY 14541

WILLIAM CROWELL, 3rd Vice Pres.

7677 Kriswood Drive Rome, NY 13440-6336

JOSEPH ROWLAND,

Secretary/Treasurer 2495 Montrose Turnpike Owego, NY 13827

AARON MORRIS, Newsletter Editor

PO Box 246 Round Lake, NY 12151

DIRECTORS

EARL VILLECCO, Chairperson

593 Tunnell Road Port Crane, NY 13833

DAVID ARTERS

5301 Webster Road Fredonia, NY 14063

ROBERT BRACHMANN

7590 Maples Road Little Valley, NY 14755

TED ELK

Co. Rt. 18 Therase, NY 13691

THOR ERIKSEN 26 Half Moon Pond Road

Ridge, NY 11961

DAVE HOWLAND

12449 Rt. 38 Berkshire, NY 13736

MARK RULISON

200 Shellstone Road Amsterdam, NY 12010

RICHARD WAKEFIELD

4 424.54

Market Helphan Anger (Little-Liberau)

Box 31

Deer River, NY 13627

[And] [基7] 数据数据数据

*01 FEB -2 A9:37

FDA Commissioner Jane Henney 5630 Fishers I

5630 Fishers Lane

Room 1061 (HFA-305)

Rockville MD 20852

26th January 2001

Dear Commissioner Henney.

As secretary of the Empire State Honey Producers Association (ESHPA), I have been instructed to inform you that the enclosed two resolutions were approved at our annual fall meeting on 3rd November 2000. Our membership is concerned about the safety of genetically modified (GM) crops, and their effects on honeybee colonies.

The first resolution resulted from my investigation into the literature on GM crops, I came across two references in college level science textbooks to tetracycline resistant genes being used in GM crops. This led me to construct a possible scenario whereby horizontal gene transfer might be responsible for American Foulbrood resistance that developed in three countries over a short time period. Subsequent searching of various information sources has failed to confirm that a tetracycline resistant gene is present in GM crops, though it may be recorded in CBI databases that I do not have access to.

of customers to a single-seminated by the energy of the entire property of the entire entire entire entire ent The second resolution developed as a consequence of some French research that was published by Picard-Nizou et al. (1997). The results discussed in this paper indicate that insecticidal components of GM crops may have harmful effects on honeybees that are not picked up by short-term toxicity tests on adult honeybees. I understand that GM crops aspiring to regulatory approval only need pass short-term toxicity tests. This is troubling, as colony strength and cohesion are essential for successful overwintering and profitability. Would it be possible for the FDA to request that USDA-ARS develop a more adequate testing protocol? Such a protocol might assess adult bee longevity, olfactory learning response, and brood rearing success ratios. The first two characteristics would not be overly difficult, as the French government research service (INRA) has already worked on this. Two national beekeeping groups, the American Honey Producers Association (AHPA) and US Beekeepers. (USB), have recently passed resolutions calling for improved GMO/honeybee toxicity analysis.

I hope that your agency can help alleviate the concerns of ESHPA and many other beekeepers across the nation. Any feedback will be appreciated, and I will convey your reply to our membership.

enskam met 10. 10-45 en sûserempeste Frindrings ûter Collings

i di mangang ang alika dan kanakanakan kan anga kalikan ang kanakan di kanakan da kanakan da kanakan da kanaka

Yours sincerely.

Joe Rowland

Sec./Treas. ESHPA

Picard-Nizou, A.L., R. Grison, L. Olseb, C. Pioche, G. Arnold and M.H. Pham-Delegue. 1997. Impact of proteins used in plant genetic engineering: toxicity and behavioral study in the honeybee. Journal of Economic Entomology 90(6): 1710-1716.

The permit executable relations of a consideration of the permit of the property of the permit of th

00P-1211

133rd Year 2001

C10726

and the second of the second o

thought all your return than an east appearing for the amount of the

Resolution: Tetracycline-resistant genes in GM crops

Whereas, Tetracycline resistant American Foulbrood (AFB) has been detected recently in the United States, Canada and Argentina; and

Whereas, AFB has the potential to inflict significant damages to the US beekeeping industry; and

Whereas, Some genetically modified (GM) crops contain tetracycline resistant genes, and GM crops were cultivated in the US, Canada, and Argentina in the period during which tetracycline resistant AFB developed; and

Whereas, European research has indicated that horizontal gene transfer from GM canola to bacteria within the intestines of honeybees does occur; therefore, be it

RESOLVED, That ESHPA requests that the FDA conducts research to determine if horizontal gene transfer has occurred between GM crops and AFB.

Resolution: Proteinase inhibitors in GM crops

Whereas, The US beekeeping industry is an important contributor to the US agricultural economy; and

Whereas, Some European research has indicated that proteinase inhibitors found in some genetically modified (GM) crops may have deleterious effects on the lifespan and learning / olfactory capabilities of adult honeybees; and

Whereas, Such effects could cause problems in colony organization, and foraging / pollination efficiency; therefore, be it

RESOLVED, That ESHPA requests that the USDA examines more closely the relationship between proteinase inhibitors in GM crops and honeybees.

TO DO TO THE SECRETARY OF THE PROPERTY OF THE

tiva a vigit indi su signit kali per tanggalahan pencerang deput

JOE ROWLAND/BEEMAN APIARIES 2495 MONTROSE TURNPIKE CWEGO, NEW YORK 13827





FDA Commissioner Jane Henney
5630 FISHERS LANE
ROOM 1061 (HFA-305)
ROCKVILLE 1
MD 20852